STATE OF ALASKA
PUBLIC COMMENT TO
NATIONAL ORGANIC STANDARDS BOARD
JUNE 7, 2001
- WRITTEN COMMENTS -

Good afternoon Madame Chair and members of the National Organic Standards Board.

My name is Fran Ulmer. I am the Lieutenant Governor of the State of Alaska. While I hail from the beautiful state of Wisconsin, I have resided in Alaska for many years. During my time as Lieutenant Governor, I have had the opportunity to work with a number of commissions and boards established to promote and protect Alaska's wonderful marine environment. This includes serving as President for the North Pacific Anadromous Fish Commission and Governor Tony Knowles' Salmon Cabinet.

I am pleased to be before you today to communicate the State of Alaska's position regarding the National Organic Standards Board's decision making process for fish and other marine resources.

At the onset, I want to applaud your efforts to assure the integrity of the National Organic Program. The system has served consumer and producers well. We hope that you will agree that developing and adopting certification standards for wild aquatics will not undermine USDA's organic program. We would like the opportunity to demonstrate how our seafood industry operates, how it is different from a traditional organic food production model, and how it meets the stringent requirements you are here to uphold.

Alaska has been working with the USDA and National Organic Standards Board for several years to assist in developing organic production certification standards for wild aquatic species. We have met with the Board and members of the National Organic Program on several occasions. Acting under the USDA's own timeline and assurances, the State has provided a significant amount of supporting material to assist in the process. Even with directives by the US Congress and promises by leadership within USDA to have standards established by September 30, 2000, these standards have not been established. To the contrary, the Aquatic Animal Task Force, subcommittee of the National Organic Standards Board, has issued recommendations that support no certification standards for wild aquatic species.

Alaska's marine environment is pristine and productive. The State of Alaska's Constitution contains strict requirements for the sustainability and conservation of its natural resources. Alaska's seafood comes from pure and natural waters. These species feed on foods found only in nature and have very little direct interaction with humans until the time they are harvested. The health value of seafood is widely known and an important part of a good human diet. The nature of our fisheries is often small scale and rooted in strong rural, coastal communities. From Alaska's perspective, it appears our seafood community is completely in synch with the intent of the organic community and the expectation mainstream America has of organic foods.

However, within the context of Organic Food Production Act, organic certification is not simply about providing the consumer with the ability to select the most healthy and natural food products possible. Federal certification of organic food is about developing a process where sufficient management of both the harvesting and production processes exists to

assure that harmful pollutant and prohibited inputs are not used. It is the verification of both production processes that is required to ensure conformance the Act, which guides the decisions of the National Organic Standards Board.

From Alaska's perspective, there is little doubt that the Organic Food Production Act allows for certification of wild aquatic seafood. This conclusion is based on several points. Alaska's ecosystem that supports its wild aquatic species is inherently organic. From the mountains that capture the snow, through the rivers that carry the water to the ocean, and to the ocean itself, there has been very little impact to the environment by humans. Alaska is one-fifth the size of the lower 48 states and has the population of Tacoma, Washington. The vast majority of our waters lack urban sprawl, dams and concrete imbankments. It is a system that, is not only in balance with nature, but is nature in and of itself. Therefore, protecting and maintaining that system, as Alaskans do, is akin to what a farm undergoes to make its operation organic. Unlike traditional farming operations where crops exist because of human intervention, therefore, requiring extra steps to bring the land back into balance with the ecosystem, Alaska has a naturally, reoccurring stock of fish that require management to preserve the natural balance. The difference is we have an organic system that is already in place, much like a wild crop.

Wild aquatic species are similar to wild crops. It is not only useful for the Board to consider the similarities between wild aquatics and wild crops, but there are USDA regulations that define commercial harvesting of fish as a crop. Under these definitions, we believe there is legal support for drawing on the rules for wild crops to assist in creating standards for wild aquatics. We would ask the Board to recognize the USDA's recognition of wild fish as a crop and act to develop regulations accordingly.

After reviewing what has been reported to us about organic production, we believe Alaska's wild seafood can meet fair and equitable standards. As described in the Aquatic Animals Task Force Recommendation on Operations that Produce Aquatic Animals, it appears the Task Force knows what must occur to have certification standards for wild aquatics. Rather than allowing those concerns to prevent the development of standards, we believe the Board should consider the Task Force's concerns regarding wild aquatic species and turn them into standards. Alaska believes it can meet them.

Alaska's seafood production system is not completely parallel to the traditional model envisioned by members of the organic community. While the traditional organic model considers an isolated parcel of land as the area of scrutiny, Alaska's model requires expansion of the scrutiny to a larger ecosystem such as a coastal habitat or watershed. The care and oversight a single farm provides for its products is, in the Alaska model, shared by a number of agencies and industry participants. I can assure you that collectively the measures applied towards the sustainability and health of Alaska's ecosystem is closely monitored by state, federal and private entities. However, I fail to see how that nullifies our system of management from earning the distinction of organic.

The Aquatic Animals Task Force asserted wild fish does not qualify because a producer of organic food cannot control five things: 1.) livestock origin; 2.) livestock feed; 3.) health care; 4.) livestock living conditions; 5.) livestock identification. In the context of our larger management area and the special nature of how we manage that area, Alaska does exert adequate management over these five areas.

Alaska knows the origins of the aquatic species native to its waters and there is constant oversight. The aquatic species of Alaska have been swimming in the waters for many centuries. The State of Alaska manages the nearshore fisheries while the National Marine

Fisheries Service manages the offshore fisheries. As co-managers of these resources, we know where the fish are born and have developed methods to estimate the number of fish available for harvest. We monitor levels of harvest to assure adequate species recruitment for future harvests. We monitor the habitat juveniles occupy to be sure they are born into an environment free of pollutants. Strict state and federal laws restrict development around wetlands without thorough environmental assessments. The State's Department of Environmental Conservation monitors all Alaskan waters for high water quality standards. All of this oversight occurs year round. We are constantly monitoring our wild aquatic species and working to assure their long-term stability.

Wild aquatic animal feed is well researched, analyzed and documented by governmental agencies. According to the Aquatic Species Task Force, producers of wild aquatics do not directly feed the fish and therefore do not meet this criterion. This presents a poorly developed understanding of the management regimes in Alaska. Biologists and fisheries managers monitor what aquatic species are eating and the water quality of habitat. As the impact of fishing and other human activity may be affecting the food supply for commercially harvested species, adjustments to harvest limits, fishing areas, and other management measures are made. A good example would be the harvest of herring. Herring is a key feeder fish for some salmon and other species. As such, commercial harvests of herring are strictly regulated to assure adequate feed for predatory species. Since we believe that wild aquatic animals are inherently natural (an argument that appears to be supported by the Task Force's approval of fishmeal and oils as permissible feed item for aquaculture operations) it would appear that the fisheries management regime's 1.) understanding of what is eaten by aquatic animals and 2.) responsibility to maintaining a balance of feed, is in fact managing what the wild aquatic animal eats. True, we do not put the feed into the water, but manage and monitor the ecosystem to assure that key ingredients of salmon's natural feed that already exists in the system is available.

The state and federal government monitor the health of aquatic species and intervene when required. In order to obtain sustainability, the state and federal government manage each aquatic species by region. When a species is in jeopardy, management actions may be taken to reduce external pressures on the species and allow for its recovery.

The living conditions of wild aquatic species are extensively monitored by agencies. As mentioned previously, the State of Alaska's Constitution and the Magnuson-Stevens Fishery Conservation and Management Act requires that waters be maintained for the highest levels of sustainability and conservation. The existing marine environment is an ideal habitat for the species that exist in it. Unlike a traditional livestock operation that is required to develop housing and artificial living conditions for each animal, the task for Alaska's fisheries managers is to maintain the existing marine environment. Minimizing human impact is the task of our managers as the natural environment cannot be improved upon.

Alaska's wild aquatic species undergo significant identification and science has evolved to identify the origin of aquatic species. Area biologists conduct hundreds of annual surveys to determine the size and nature of species in given regions. Science has evolved to a point where marine biologist can identify aquatic species origins through genetic testing and other means. This information tells managers and industry the expected health and expected harvest levels of fisheries into the future. There is a tremendous amount of attention given to the identification as it pertains to the end use of commercial harvests.

With that I will conclude my presentation and answer any questions you might have. Thank you for your time and attention.

Alaska's Sustainable Harvest Practices

- Constitutional mandate for sustained yield
- Decentralized management and research programs
- Rapid management response
- Separation of management from allocation
- Limited entry
- Effective hatchery regulation
- Habitat protection
- Sustainable salmon fisheries policy
- Developing fisheries policy
- Marine Stewardship Council in 2000

Alaska Salmon Enhancement Program

- ADFG oversees and regulates all state and private sector salmon rehabilitation and enhancement programs
- Stringent permitting processes to protect natural stocks
- Geneticists, pathologists, and biologists review projects and approve permits prior to release or transfer of fish
- Pathology, genetics, coded-wire tag and otolith labs provide information to managers and technical expertise
- Aquaculture industry is 40% of Alaska's agricultural products
- Over 1.4 billion fish released and 58 million harvest in 2000
- Hatchery salmon 43% of 2000 commercial harvest of 136 million

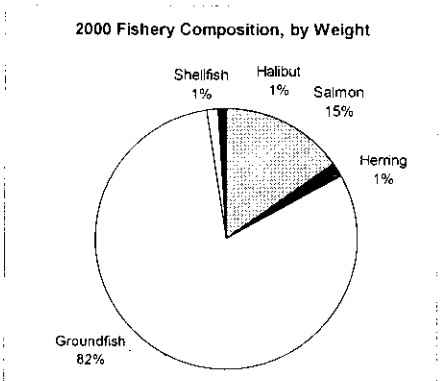
Sustainable Salmon Fisheries Policy

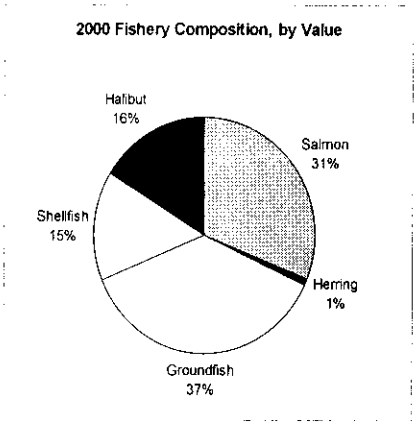
- Wild salmon populations and their habitats must be protected to maintain resource productivity
- Fisheries shall be managed to allow escapements within ranges necessary to conserve and sustain potential salmon production and maintain normal ecosystem functioning
- Effective salmon management systems should be established and applied to regulate human activites that affect salmon
- Public support and involvement for sustained use and protection of salmon resources must be maintained
- In the face of uncertainty, salmon stocks, fisheries, artificial propagation and essential habitats must be managed conservatively

Developing Fisheries Policy

- Precautionary approach to development of new fisheries
- New fisheries not allowed without research and management plan
- Reduced risk of overexploitation and overcapitalization
- Maintain integrity, diversity and productivity of the ecosystems
- Understand potential socioeconomic impacts and benefits

Alaska's 2000 Commercial Fish Harvest

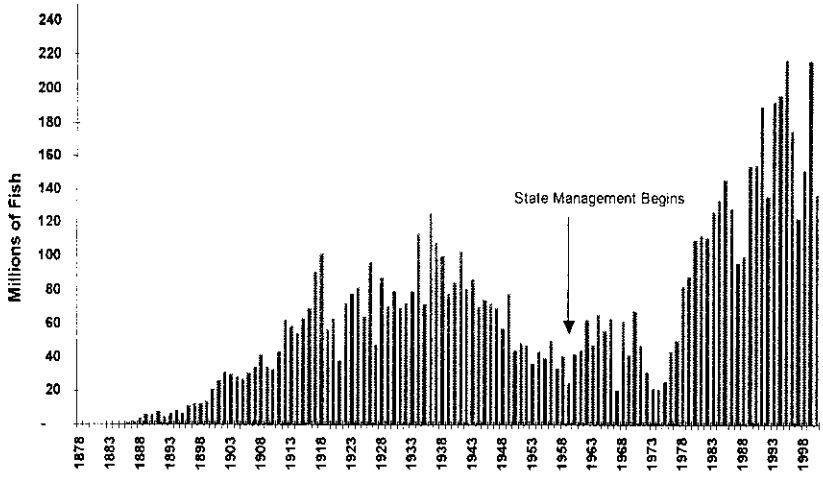


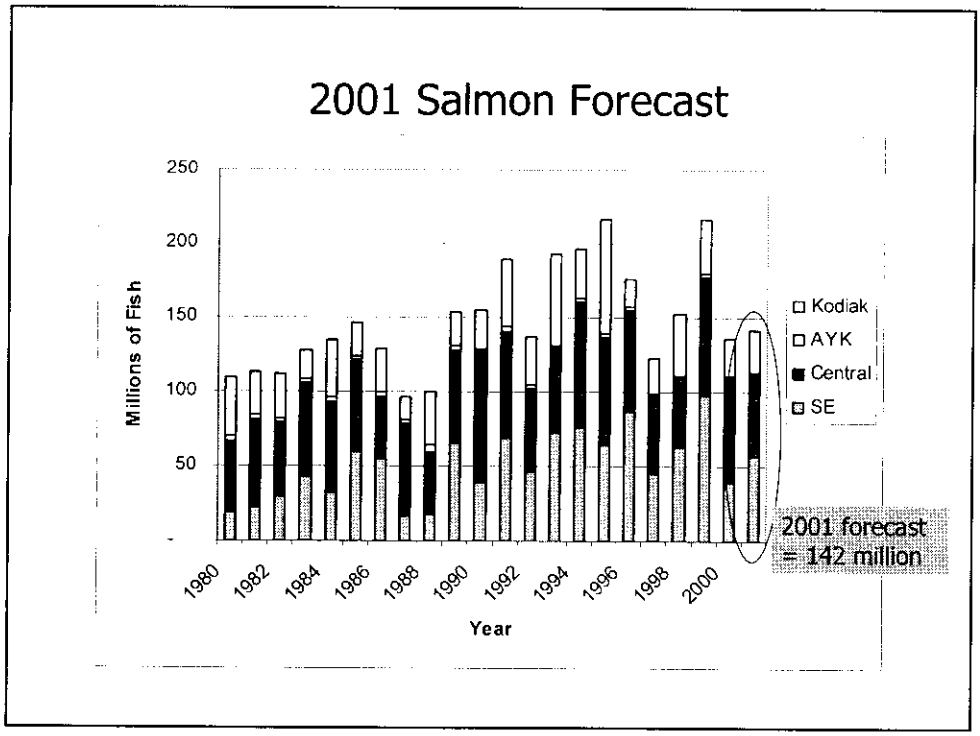


Total weight=4.6 billion pounds

Total value=$883 million

Alaska Commercial Salmon Harvests, 1878-2000




2001 Salmon Forecast
250
200
150
100
50
-
Millions of Fish
1980
1982
1984
1986
1988
1990
1992
1994
1996
1998
2000
Year
Kodiak
AYK
Central
SE
2001 forecast
= 142 million